

LAW OFFICES OF
DANIEL A. MCGUINNESS, PC

260 MADISON AVE, 17TH FLOOR, NEW YORK, NY 10016
TEL: (212) 679-1990 · FAX: (888)-679-0585 · EMAIL: DAN@LEGALMCG.COM

July 28, 2022

VIA ECF

MEMO ENDORSED

Hon. Katherine Polk Failla
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States of America v. Christian Baez, 19 Cr. 690 (KPF)*

Dear Judge Failla,

I am counsel to defendant Christian Baez in the above-captioned case. I write to respectfully request a modification of my client's pretrial release status. Mr. Baez is seeking to make a one-day trip outside of his specified judicial districts on July 28, 2022 for his son's birthday. Mr. Baez requests permission to travel to the District of New Jersey for a family trip to a water park located at 1 American Dream Way, East Rutherford, NJ 07073. Accordingly, I respectfully request Mr. Baez be permitted to travel to the desired location in the District of New Jersey from 12:00pm to 10:00pm on July 28, 2022. Pretrial and the Government do not object to this request.

Thank you for your attention to this matter.

Very truly yours,



Daniel A. McGuinness

Cc: All Counsel (via ECF)

Application GRANTED. Mr. Baez is permitted a one-day modification of his pretrial release status in line with this letter.

The Clerk of Court is directed to terminate the pending motion at docket entry 238.

Dated: July 25, 2022
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE